

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRAVELERS INDEMNITY COMPANY, :
TRAVELERS INDEMNITY COMPANY OF :
CONNECTICUT, formerly known as TRAVELERS :
INDEMNITY COMPANY OF RHODE ISLAND, :
TRAVELERS CASUALTY AND SURETY :
COMPANY, formerly known as THE AETNA :
CASUALTY AND SURETY COMPANY, and :
TRAVELERS PROPERTY CASUALTY :
COMPANY OF AMERICA, formerly known as :
TRAVELERS INDEMNITY COMPANY OF :
ILLINOIS, :

Plaintiffs, :

vs. :

NORTHROP GRUMMAN CORPORATION, :
successor in interest to GRUMMAN :
CORPORATION, NORTHROP GRUMMAN :
SYSTEMS CORPORATION, successor in interest :
to GRUMMAN AEROSPACE CORPORATION, :

Defendants, :

and :

CENTURY INDEMNITY COMPANY, eventual :
successor in interest to INSURANCE COMPANY :
OF NORTH AMERICA, :

Nominal Defendant. :

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CASE NO.: 1:12-cv-03040-KBF

**NOTICE OF TRAVELERS' MOTION
FOR PARTIAL SUMMARY
JUDGMENT THAT THE 1983 AND
1984 ENVIRONMENTAL HAZARD
POLICIES DO NOT COVER THE
BETHPAGE FACILITY CLAIM**

ORAL ARGUMENT REQUESTED

ECF CASE

**NOTICE OF TRAVELERS' MOTION FOR PARTIAL SUMMARY JUDGMENT
THAT THE 1983 AND 1984 ENVIRONMENTAL HAZARD POLICIES
DO NOT COVER THE BETHPAGE FACILITY CLAIM**

PLEASE TAKE NOTICE THAT, Plaintiff and Counterclaim Defendant The
Travelers Indemnity Company ("Travelers"), by and through its undersigned attorneys, will move
this Court, before the Honorable Katherine B. Forrest, at the Daniel Patrick Moynihan United States

Courthouse, 500 Pearl Street, New York, New York 10007, for an Order granting Travelers partial summary judgment pursuant to Federal Rule of Civil Procedure 56(a).

Travelers respectfully requests that the Court grant its motion for partial summary judgment that the 1983 and 1984 Environmental Hazard Policies do not cover the Bethpage Facility claim (as that claim is defined in the motion papers).

Respectfully submitted:

Dated: July 29, 2013
New York, New York

By: /s/ Mary Beth Forshaw

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